

DISTRICT OF MASSACHUSETTS
BOSTON, MASSACHUSETTS

UNITED STATES

v.

SAMNANG MEAS

Affidavit

I, Todd I. Richards, Special Agent, Federal Bureau of Investigation (FBI),
being duly sworn upon my oath, depose and state the following:

1. I have been a Special Agent for approximately 16 years, assigned to the
Boston Division of the FBI, and currently assigned to the Lowell Resident Agency.

2. The Middlesex County District Attorney's Office has requested the
assistance of the FBI in the location and apprehension of SAMNANG MEAS, date of birth:
***** **, 1981, social security account number, ***-**-8397. A copy of the letter
requesting such assistance is attached hereto.

3. I have conducted an investigation and determined the following:

a. On June 28, 2004, SAMNANG MEAS was charged with the crimes of
ACCESSORY AFTER THE FACT OF MURDER in violation of Massachusetts General
Law, Chapter 274 section 4, five counts of POSSESSION OF A FIREARM or
AMMUNITION WITHOUT AN FID CARD in violation of Massachusetts General Law,
Chapter 269, Section 10(h), CARRYING A FIREARM WITHOUT A LICENSE in
violation of Massachusetts General Law, Chapter 269, Section 10(a); and POSSESSION OF
A CLASS B SUBSTANCE in violation of Massachusetts General Law, Chapter 94C,
Section 34.

b. The crime of ACCESSORY AFTER THE FACT OF MURDER is a
felony offense punishable by a maximum penalty of life in prison. The crime of CARRYING
A FIREARM WITHOUT A LICENSE is a felony offense punishable by a maximum
sentence of five years in prison.

c. The crime of POSSESSION OF A FIREARM or AMMUNITION
WITHOUT AN FID CARD is a misdemeanor offense punishable by a maximum penalty of

1 two years in prison. The crime of POSSESSION OF A CLASS B SUBSTANCE is a
2 misdemeanor offense punishable by a maximum sentence of one year.

3 d. On June 28, 2004, warrants were issued by the Lowell, Massachusetts
4 District court for the arrest of SAMNANG MEAS.

5 e. Law enforcement efforts to locate SAMNANG MEAS within the
6 Commonwealth of Massachusetts since that date have been unsuccessful.

7 4. Following a diligent investigation by local, state and federal authorities, it
8 has been determined that SAMNANG MEAS is no longer residing in the Commonwealth of
9 Massachusetts.

10 5. As a result of investigation by law enforcement authorities, it is believed
11 that SAMNANG MEAS has fled from Providence, Rhode Island where he was last
12 observed, to North Carolina.

13 6. Assistant District Attorney THOMAS F. O'REILLY has informed me that
14 the Middlesex District Attorney will rendite SAMNANG MEAS if he is apprehended in the
15 United States or abroad.

16 7. Attached hereto and made part hereof are copies of the criminal complaint
17 and warrant for arrest issued by the Lowell District Court for the apprehension of
18 SAMNANG MEAS.

19 8. Based upon the foregoing and upon my training as a Special Agent of the
20 FBI, there is probable cause to believe that SAMNANG MEAS has fled the Commonwealth
21 of Massachusetts.

Todd I. Richards

Todd I. Richards
Special Agent
Federal Bureau of Investigation
Lowell Resident Agency

22
23
24
25 Subscribed and sworn to before me this 8th day of July 2004

Marianne B. Bowler
Marianne B. Bowler
United States Magistrate Judge



THE COMMONWEALTH OF MASSACHUSETTS
MIDDLESEX DISTRICT ATTORNEY
151 WARREN STREET, SUITE 100, LOWELL MA.01852

MARTHA COAKLEY
DISTRICT ATTORNEY

Tel: (978) 458-4440
Fax: (978) 452-1404

July 6, 2004

Michael J. Sullivan
United States Attorney
U.S. Courthouse, Suite 9200
1 Courthouse Way
Boston, MA 02210

Re: Commonwealth v. Daniel Keo Kung
AND
Commonwealth v. Samnang Meas

Dear Mr. Sullivan:

The above named individuals are the subject of outstanding warrants. Daniel Keo Kung is wanted for Murder and Illegal Possession of a Firearm; (Warrant: #0411CR004281). Samnang Meas is wanted for Accessory After the Fact to Murder, four counts of Possession of a Firearm Without FID, Illegal Possession of Ammunition, Possession of Class B substance and Illegal Possession of a Firearm (Warrant #: 0411CR004280). Both warrants were issued by the Lowell District Court on June 28, 2004.

I have enclosed certified copies of these warrants and the complaint applications for your review. This Office requests the assistance of the U.S. Department of Justice in obtaining their presence in this jurisdiction through the unlawful flight to avoid prosecution statute. This Office will extradite both Mr. Kung and Mr. Meas within the United States. The case officer is Detective Christopher T. Doolin, Lowell Police, 978-937-3242. The assigned prosecutor is Elizabeth A. Dunigan, 978-458-4440, ext. 410. If additional information is necessary, please call.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Thomas F. O'Reilly".

Thomas F. O'Reilly
Assistant District Attorney
Chief, Lowell Division
Middlesex County
151 Warren Street, Suite 100
Lowell, MA 01852
(978) 458-4440, ext. 404

ARREST

The within named complainant requests that a complaint issue against the within named defendant, charging said defendant with the offense(s) listed below.

Lowell District Court
41 Hurd Street
Lowell, MA. 01852

DATE OF APPLICATION 6/25/04
DATE OF OFFENSE 6/24/04
PLACE OF OFFENSE Lowell, MA

NAME OF COMPLAINANT	NO.	OFFENSE	G.L. Ch. and Sec
Det. C. Doolin			
ADDRESS AND ZIP CODE OF COMPLAINANT Lowell PD 50 Arcand Drive, Lowell, MA	1.	Accessory after the fact to murder	274-4
NAME, ADDRESS AND ZIP CODE OF DEFENDANT Meas, Samnang 39 Shaffer ST Lowell, MA	2.	Possess Firearm without FID	269-10A
	3.	Possess Firearm without FID	269-10B
	4.	Possess Firearm without FID	269-10C
COURT USE ONLY →	A hearing upon this complaint application will be held at the above court address on		DATE OF HEARING TIME OF HEARING COURT USE ONLY

CASE PARTICULARS - BE SPECIFIC

NO.	NAME OF VICTIM Owner of property, person assaulted, etc.	DESCRIPTION OF PROPERTY Goods stolen, what destroyed, etc.	VALUE OR PROPERTY Over or under \$250.	TYPE OF CONTROLLED SUBSTANCE OR WEAPON Marijuana, gun, etc.
1	Ponartih Hong			
2	Comm OF MASS.			22 CAL. PISTOL
3	" " "			MOSSBERG 12 GAUGE SHOTGUN
4	" " "			REMINGTON 20 GAUGE SHOTGUN

OTHER REMARKS:

L.P.D. CASE # 04-11244

In testimony that the foregoing is a true copy on file and of record made by photographic process, I hereunto set my hand and affix the seal of the District Court of Lowell this _____ day of JULY 2004

SIGNATURE OF COMPLAINANT
CLERK OF DISTRICT COURT

DEFENDANT IDENTIFICATION INFORMATION - Complete data below

DATE OF BIRTH 6/8/81	PLACE OF BIRTH Thailand	SOCIAL SECURITY NUMBER 031 64 8397	SEX M	RACE A	HEIGHT 5'10"	WEIGHT 180	EYES Brn	HAIR Brn
OCCUPATION	EMPLOYER/SCHOOL	MOTHER'S NAME (MAIDEN)	FATHER'S NAME					
		Bour Sen	Henry Meas					

COURT USE ONLY

DATE	DISPOSITION	AUTHORIZED BY
	NO PROCESS TO ISSUE <input type="checkbox"/> At request of complainant <input type="checkbox"/> Complainant failed to prosecute <input type="checkbox"/> Insufficient evidence having been presented	
	PROCESS TO ISSUE <input type="checkbox"/> Sufficient evidence presented <input type="checkbox"/> Defendant failed to appear	TYPE OF PROCESS <input type="checkbox"/> Warrant <input type="checkbox"/> Summons returnable
	<input type="checkbox"/> Continued to _____	
COMMENTS		

<input type="checkbox"/> ARREST <input checked="" type="checkbox"/> HEARING <input type="checkbox"/> SUMMONS <input checked="" type="checkbox"/> WARRANT		COURT DIVISION	
The within named complainant requests that a complaint issue against the within named defendant, charging said defendant with the offense(s) listed below.			
DATE OF APPLICATION 6/25/04	DATE OF OFFENSE 6/24/04	PLACE OF OFFENSE Lowell, MA	
NAME OF COMPLAINANT Det. C. Doolin		NO.	OFFENSE
ADDRESS AND ZIP CODE OF COMPLAINANT Lowell PD 50 Arcand Drive, Lowell, MA		1.	Poss. Firearm w/o FID
		2.	Illeg. Poss. of Ammo.
NAME, ADDRESS AND ZIP CODE OF DEFENDANT Meas, Samnang 39 Shaffer St Lowell, MA		3.	Poss. Class B.
		4.	Illeg. Poss of Firearm
COURT USE ONLY →	A hearing upon this complaint application will be held at the above court address on	DATE OF HEARING	TIME OF HEARING
		AT	COURT USE ← ONLY
CASE PARTICULARS — BE SPECIFIC			
NO.	NAME OF VICTIM Owner of property person assaulted, etc	DESCRIPTION OF PROPERTY Goods stolen, what destroyed, etc.	VALUE OR PROPERTY Over or under \$250.
1	Comm OF MASS		REMINGTON .308 CAL. RIFLE
2	" " "		VARIOUS CALIBER OF AMMUNITION
3	" " "		Cocaine
4			
OTHER REMARKS:		In testimony that the foregoing is a true copy on file and of record made by photographic process, I hereunto set my hand and affix the seal of the District Court of Lowell this _____ day of JUL - 12 2004 X _____ SIGNATURE OF CLERK/MAGISTRATE	
DEFENDANT IDENTIFICATION INFORMATION — Complete data below if known.			
DATE OF BIRTH 6/8/81	PLACE OF BIRTH Thailand	SOCIAL SECURITY NUMBER 031 64 8397	SEX M
OCCUPATION	EMPLOYER/SCHOOL	MOTHER'S NAME (MAIDEN) Bour Soen	FATHER'S NAME Henry Meas
↓ COURT USE ONLY ↓			
DATE	DISPOSITION		AUTHORIZED BY
	NO PROCESS TO ISSUE <input type="checkbox"/> At request of complainant <input type="checkbox"/> Complainant failed to prosecute <input type="checkbox"/> Insufficient evidence having been presented		
	PROCESS TO ISSUE <input type="checkbox"/> Sufficient evidence presented <input type="checkbox"/> Defendant failed to appear		TYPE OF PROCESS <input type="checkbox"/> Warrant <input type="checkbox"/> Summons returnable
Continued to _____			
COMMENTS			

Lowell

NAME, ADDRESS AND ZIP CODE OF DEFENDANT

MEAS, SAMNANG
39 SHAFFER ST.
LOWELL, MA 01852

Lowell District Court

TO ANY AUTHORIZED OFFICER:
REASON FOR WARRANT

- ☒ Representation of prosecutor that defendant may not appear unless arrested.
- ☐ Defendant failed to appear after being summoned to appear.
- ☐ Defendant failed to appear after recognizing to appear.
- ☐ Defendant failed to pay court ordered monies in the amount of \$_____.
- ☐ Defendant failed to pay non-criminal motor vehicle fine in the amount of \$_____.
- ☐ Defendant failed to appear for Probation Surrender Hearing
- ☐ Other:

DATE OF BIRTH	SEX	RACE	HEIGHT	WEIGHT	EYES	HAIR
06/08/1981	M	A	5'10"	180	BRO	BRO

C.C. #	SOCIAL SECURITY #
	031-64-8397

DATE OF OFFENSE	PLACE OF OFFENSE
06/24/2004	LOWELL

COMPLAINANT	POLICE DEPARTMENT
LAFERRIERE, PAUL	LOWELL PD - COMMUNIC

DATE OF COMPLAINT	RETURN DATE AND TIME
06/28/2004	

COUNT-OFFENSE

1 - 274/4 ACCESSORY AFTER THE FACT c274 §4

on 06/24/2004, knowing that DANIEL KEO KUNG had committed a felony, to wit: MURDER, did harbor, conceal, maintain or assist such person, with the intent that such person should avoid or escape detention, arrest, trial or punishment, in violation of G.L. c.274, §4. (NO DISTRICT COURT FINAL JURISDICTION IN ADULT SESSION.)

COUNT-OFFENSE

1 - 269/10/G FIREARM WITHOUT FID CARD, POSSESS c269 §10(h)

on 06/24/2004 did own, possess or transfer possession of a firearm, rifle, shotgun or ammunition without complying with the requirements relating to firearm identification cards as provided for in G.L. c.140, §129C, in violation of G.L. c.269, §10(h). (PENALTY: jail or house of correction not more than 2 years; or not more than \$500; §10(c): item to be ordered forfeited.)

In testimony that the foregoing is a true and correct copy on file and of record made by photographic process, I hereunto set my hand and affix the seal of the District Court of Lowell this _____ day of JUL - 1 2004

CLERK MAGISTRATE

COUNT-OFFENSE

1 - 269/10/G FIREARM WITHOUT FID CARD, POSSESS c269 §10(h)

on 06/24/2004 did own, possess or transfer possession of a firearm, rifle, shotgun or ammunition without complying with the requirements relating to firearm identification cards as provided for in G.L. c.140, §129C, in violation of G.L. c.269, §10(h). (PENALTY: jail or house of correction not more than 2 years; or not more than \$500; §10(c): item to be ordered forfeited.)

COUNT-OFFENSE

1 - 269/10/G FIREARM WITHOUT FID CARD, POSSESS c269 §10(h)

on 06/24/2004 did own, possess or transfer possession of a firearm, rifle, shotgun or ammunition without complying with the requirements relating to firearm identification cards as provided for in G.L. c.140, §129C, in violation of G.L. c.269, §10(h). (PENALTY: jail or house of correction not more than 2 years; or not more than \$500; §10(c): item to be ordered forfeited.)

COPY

THE COURT HAS ORDERED THAT A ☒ WARRANT ☐ DEFAULT WARRANT ISSUE AGAINST THE ABOVE DEFENDANT

Therefore you are hereby commanded to arrest the above named defendant and bring the defendant forthwith before this court to answer to the offense(s) listed above and to be dealt with according to law.

WITNESS: FIRST JUSTICE

DATE OF ISSUE
06/28/2004

CLERK MAGISTRATE/ASST. CLERK

COUNT-OFFENSE

1 - 269/10/G FIREARM WITHOUT FID CARD, POSSESS c269 §10(h)

on 06/24/2004 did own, possess or transfer possession of a firearm, rifle, shotgun or ammunition without complying with the requirements relating to firearm identification cards as provided for in G.L. c.140, §129C, in violation of G.L. c.269, §10(h). (PENALTY: jail or house of correction not more than 2 years; or not more than \$500; §10(c): Item to be ordered forfeited.)

COUNT-OFFENSE

1 - 269/10/G FIREARM WITHOUT FID CARD, POSSESS c269 §10(h)

on 06/24/2004 did own, possess or transfer possession of a firearm, rifle, shotgun or ammunition without complying with the requirements relating to firearm identification cards as provided for in G.L. c.140, §129C, in violation of G.L. c.269, §10(h). (PENALTY: jail or house of correction not more than 2 years; or not more than \$500; §10(c): Item to be ordered forfeited.)

COUNT-OFFENSE

1 - 269/10/J FIREARM, CARRY WITHOUT LICENSE c269 §10(a)

on 06/24/2004 did knowingly have in his or her possession, or under his or her control in a vehicle, a firearm, as defined in G.L. c.140, §121, or a rifle or shotgun, not then being present in or on his or her residence or place of business, and not having in effect a license to carry firearms or otherwise being authorized by law to do so, in violation of G.L. c.269, §10(a). (PENALTY: state prison not less than 2½ years, not more than 5 years; or jail or house of correction not less than 1 year, not more than 2½ years; no continuance with a finding, filing, or suspended sentence; no reduction of sentence, probation, parole, furlough, or sentence deduction until 1 year served; §10(c): firearm, rifle or shotgun to be ordered forfeited.)

COUNT-OFFENSE

1 - 94C/34/C DRUG, POSSESS CLASS B c94C §34

on 06/24/2004, not being authorized by law, did knowingly or intentionally possess a controlled substance in Class B of G.L. c.94C, §31, to wit: COCAINE, in violation of G.L. c.94C, §34. (PENALTY: Imprisonment not more than 1 year; or not more than \$1000; or both.)

In testimony that the foregoing is a true copy on file and of record made by photographic process, I hereunto set my hand and affix the seal of the District Court of Lowell this _____ day of JUL 8 2004

COUNT-OFFENSE

CLERK/MAGISTRATE

COUNT-OFFENSE

COPY

COMPLAINANT

X

SWORN TO BEFORE CLERK/MAGISTRATE/ASST. CLERK

X

ON (DATE)

6/28/04